

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ZACHARY WATKINS,

Defendant.

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No. 3:21-CR- 041

(Judge)

FILED
SCRANTON

FEB 23 2021

PER

DEPUTY CLERK

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Between on or about January 1, 2020, and on or about January 27, 2021, in Lackawanna County, within the Middle District of Pennsylvania, the defendant,

ZACHARY WATKINS,

did knowingly receive and distribute visual depictions of minors engaging in sexually explicit conduct, using any means and facility of interstate and foreign commerce, and that had been shipped and transported in or affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means including by computer, and the production of such visual depictions involved the use of

a minor engaging in sexually explicit conduct, and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

FORFEITURE ALLEGATION

The allegation contained in Count 1 of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 2252(a)(2) the defendant,

ZACHARY WATKINS

shall forfeit to the United States of America any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of said offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The

property to be forfeited includes, but is not limited to, the following:

- a. One Samsung Cellular Phone, Model SM-S260DL (GP),
Serial No. RF8N100SFZJ;
- b. One ZTE Model Z559DL, Serial No. 320187261142;
- c. One Western Digital 160GB Hardrive, Serial No.
WCAV36303354;
- d. One My Passport Hardrive, Serial No. WX21D6625VDU;
- e. One Seagate Expansion Portable Drive, Serial No.
NA87D4KG;
- f. One Samsung Cellular Phone, Model SM-N975U, IMEI No.
359186103891380.

If any of the forfeitable property described above, as a result of any act or omission of the defendant:

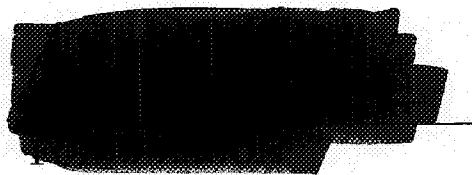
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third
party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot
be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

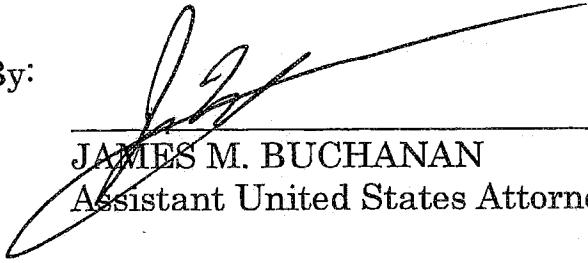
All pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

BRUCE D. BRANDLER
Acting United States Attorney

A large black rectangular redaction box covering the signature of the United States Attorney.

By:


JAMES M. BUCHANAN
Assistant United States Attorney

Date: 2-23-21